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January 21, 2020

**Via ECF**

Hon. Christina Reiss  
United States District Court  
District of Vermont  
P.O. Box 446  
Burlington, VT 05402-0446

**Re: *Black Love Resists, et al. v. The City of Buffalo, et al.*, Case No.:1:18-cv-719**

Dear Judge Reiss:

On behalf of Plaintiffs in the above-captioned action, I write pursuant to the Court's Opinion and Order of December 19, 2019 to inform Your Honor that Plaintiffs have elected the production of the 168 requested Buffalo Police Department Internal Affairs Division (IAD) files subject to an attorneys' eyes only protective order. *See* ECF No. 51 at 19, 21.

In addition, as directed by the Court, Plaintiffs have drafted the attached proposed attorneys' eyes only protective order, which is modeled closely on the attorneys' eyes only protective order governing the production of New York City Police Department Internal Affairs Bureau records in the *Floyd v. City of New York* litigation. *See* 08 Civ. 1034, ECF No. 112 (S.D.N.Y. August 11, 2010). Plaintiffs' counsel shared the attached proposed order with Defendants' counsel via email on January 10, 2020, and asked that he indicate whether the order's language was acceptable to Defendants. However, to date, Plaintiffs have received no response from Defendants.

Accordingly, Plaintiffs respectfully request that the Court sign and enter the attached proposed order. Thank you for your time and consideration.

Sincerely,

\s\ Darius Charney  
Darius Charney

*Counsel for Plaintiffs*

Encl.

Cc: Robert Quinn, Esq. (*Counsel for Defendants*)*(via ECF)*